



## Nebraska Chapter of The Wildlife Society

715 Lake Street, Chadron, NE 69337

(308)432-3654

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August 15, 2018

Jeff Fassett, Director

Nebraska Department of Natural Resources

301 Centennial Mall South

PO Box 94676

Lincoln, NE 68509-4676

**Re: Platte Republican Interbasin Transfer Application, A-19594**

Mr. Fassett,

The Nebraska Chapter of the The Wildlife Society (NETWS) is submitting our objection (under Option 1 of the public notice) to the Application for the Platte Republican Interbasin Transfer Project. The NETWS is made up of natural resource professionals and students who are dedicated to, among other things, the wise management of Nebraska's wildlife resources. Our objections can be summarized into three categories: 1) water in the Platte River is never "wasted", 2) invasive species transfer with this project is likely and 3) this project does not address the actual water issues in the Republican River Basin.

The NETWS supports responsible water decision-making in Nebraska to provide habitat for our fisheries and wildlife, as well as recreational opportunities for residents and visitors. However, NETWS has concerns regarding the insufficient consideration given to environmental and recreational impacts of this transfer in the analysis provided with the application. The application states that there are no adverse impacts. NETWS feels that the analysis of adverse impacts was limited and the conclusion inaccurate. The application classified the current beneficial uses of unappropriated water only for meeting Target Flows of the Platte River Recovery Implementation Program (PRRIP) and existing instream flows. This does not account for other environmental and recreational benefits of leaving water in the basin beyond those legal requirements. This water is serving important ecological, stream hydraulic, and habitat forming functions as well as providing significant groundwater recharge. These benefits increase with flows beyond "Target Flows" but that is not accounted for in the analysis. There are a host of benefits to a wide range of aquatic biota and riverine habitats by flows exceeding minimum requirements and these largely depend on periodic pulse flow events.



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One of the benefits stated in the application of this project is the increased water levels at Harlan County Reservoir which would attract more recreational users to the reservoir. However, this water is destined for Kansas and fluctuating water levels are not ideal for fish communities or recreational users. Further, this project will likely increase the sediment load coming into the reservoir and the application does not state how this will be addressed, nor any cost associated with this.

The transfer of invasive species from the Platte River Basin to the Republican River Basin is likely if this project happens. Currently, silver carp (*Hypophthalmichthys molitrix*) are present in the Platte River near Lexington, while grass carp (*Ctenopharyngodon idella*), bighead carp (*Hypophthalmichthys nobilis*) and white perch (*Monoroe americana*) are all present near Kearney. Any of these fish species would disrupt the fishery ecosystem in the Republican River Basin and Harlan County Reservoir, causing irreversible damage. Silver carp, for example, can jump up to 10 feet out of the water when frightened. If they were to get transferred into Harlan County Reservoir, the impact to recreation would be tremendous and there is little that could be done to eliminate them. Asian clams (*Corbicula fluminea*), which are already present in the Platte River Basin, could clog irrigation pipes if transferred between basins. By connecting these two basins, it essentially creates a "super watershed" which will expedite the spread of any future invasive species such as if zebra mussels (*Dreissena polymorpha*) were to get into the Platte River above the diversion.

The proposed project will do little to address the water issues in the Republican River Basin, while at the same time causing more issues in the Platte River Basin. It treats water as a commodity and not the natural resource it is. The application itself states the current level of irrigation development in the Republican River Basin results in violation of the compact (pg. 7 of the application). Furthermore, the first objective of the basin-wide sustainable water management plan for the Republican River Basin is to increase water supply through interbasin transfer instead of focusing on ways to address the water issues within the basin itself. Sustainable water management should not be focused on getting water from other basins, but rather managing the water within the basin. This may include wetland restoration for improved groundwater recharge as well as other land and water management techniques that address local water resource concerns. Groundwater recharge is listed as a benefit for the Republican River once the water is diverted but the loss of that recharge due to less water in the Platte is not considered in the application.

The NETWS opposes this application because we believe water should remain in the Platte River Basin, the transfer of invasive species would be detrimental and this project still does not solve the problems of the Republican River Basin. The analysis provided by the applicant does not sufficiently evaluate all of



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the environmental and economic impacts of this type of water transfer. Thank you for the opportunity to comment on this proposal and please contact us with any questions.

Sincerely,

Matt Steffl

President

Nebraska Chapter of The Wildlife Society

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